

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Civil Action No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

**DEFENDANTS' SUBMISSION OF LUCY P. ALLEN'S DIRECT TESTIMONY
AND EXHIBITS FOR CLASS CERTIFICATION HEARING**

Pursuant to the Court's October 2, 2023 Order (Dkt. 135), Defendants Apache Corporation, John J. Christmann, IV, Timothy J. Sullivan, and Stephen J. Riney ("Defendants") hereby submit the proposed direct examination of Defendants' expert, Lucy P. Allen, for the December 6, 2023 class certification hearing. Ms. Allen's proposed direct examination and accompanying exhibits are attached to this pleading.

Dated: November 29, 2023

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

David D. Sterling
Attorney-In-Charge
State Bar No. 19170000
Federal I.D. No. 07079
Amy Pharr Hefley
State Bar No. 24046046
J. Mark Little
State Bar No. 24078869
Federal I.D. No. 1487508
Anthony J. Lucisano
State Bar No. 24102118
Federal I.D. No. 3369146
Frank Mace
State Bar No. 24110609
Federal I.D. No. 3385915
910 Louisiana Street
Houston, Texas 77002
(713) 229-1946
(713) 229-7946 (Fax)
david.sterling@bakerbotts.com
amy.hefley@bakerbotts.com
mark.little@bakerbotts.com
anthony.lucisano@bakerbotts.com
frank.mace@bakerbotts.com

John B. Lawrence
Texas Bar No. 24055825
S.D. Tex. No. 3124414
2001 Ross Avenue, Suite 900
Dallas, Texas 75201
(214) 953-6873
(214) 661-4873 (Fax)
john.lawrence@bakerbotts.com

ATTORNEYS FOR DEFENDANTS APACHE
CORPORATION, JOHN J. CHRISTMANN IV,
TIMOTHY J. SULLIVAN, AND STEPHEN J.
RINEY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via ECF on all counsel of record on this 29th day of November, 2023.

/s/ Amy Pharr Hefley

Amy Pharr Hefley